

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CHICAGO REGIONAL COUNCIL OF)
CARPENTERS PENSION FUND, et al.,)
)
Plaintiffs,) Case No. 08 C 1054
)
) Judge Gottschall
v.)
) Magistrate Judge Schenkier
REED MACHINERY & TRANSPORTATION)
COMPANY, INC.,)
)
Defendant.)

SWORN DECLARATION PURSUANT TO 28 U.S.C.A. § 1746

Raymond J. Sanguinetti declares as follows:

1. I am an associate of the law firm of Whitfield & McGann and am licensed to practice law in the State of Illinois and in the U.S. Dist. Court for Northern District of Illinois, Eastern Division.
2. I have personal knowledge of the facts stated herein and if called to testify in this matter, I can competently testify to such facts from my own such knowledge.
3. I have in excess of 10 years experience representing trustees of employee benefit plans, including the prosecution of Federal Court litigation to compel compliance with the bonding provisions of the collective bargaining agreement and to collect delinquent employer contributions.
4. Defendant is obligated to pay the attorney fees and court costs incurred by the Plaintiffs pursuant to 29 U.S.C. §1132(g)(1).
5. I have devoted 7.00 hours in connection with this case at the rate of \$165.00 per hour. The total attorney fees billings is \$1,155.00. (See Attached Bill Slips)

6. In addition, the filing fee was \$350.00 and the fee for service of process was an additional \$55.00. These costs total \$405.00.

7. I certify that the attached detailed attorney fees and costs totaling \$1,560.00 were necessary and reasonable.

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in this Declaration is true and correct.

Date: April 30, 2008

s/ RAYMOND J. SANGUINETTI

Attorney for the Chicago Regional
Council of Carpenters Pension Fund, et
al.

4/30/2008
2:14 PMWHITFIELD, McGANN & KETTERMAN
Slip Listing

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Selection Criteria

Case (hand select) Include: CBOND.N7551/19138
Slip Classification OpenRate Value and Slip Value hidden by Security Rights
Rate Info - identifies rate source and level

Slip ID	ATTORNEY	Units	Rate	Slip Value
Dates and Time	Activity	DNB Time	Rate Info	
Posting Status	Case	Est. Time	Bill Status	
Description	Reference	Variance		
349364 TIME 11/7/2007 Billed G:72400 12/3/2007 Review bond referral. Research Illinois Secretary of State records for corporate information. Prepared bond demand letter. Prepared updates on bond cases for Daniel McAnally and Robert Lid. Diary for suit.	RJS Billable CBOND.N7551/19138	1.00 0.00 0.00 0.00	T@12	
349574 TIME 11/20/2007 Billed G:72400 12/3/2007 Prepared Federal Civil suit for wage and fringe benefit bond; Prepared exhibits; Prepared Federal Summons; Prepared civil cover sheet and appearance; Letter to legal process server.	RJS Billable CBOND.N7551/19138	1.75 0.00 0.00 0.00	T@12	
349583 TIME 11/21/2007 Billed G:72400 12/3/2007 Prepared letter to Robert Lid regarding case status and filing of complaint.	RJS Billable CBOND.N7551/19138	0.50 0.00 0.00 0.00	T@12	
350516 TIME 11/7/2007 Billed G:72400 12/3/2007 Computer Research Fees/CD ROM	CPW Lexis CBOND.N7551/19138	0.25 0.00 0.00 0.00	A@1	
353666 TIME 2/25/2008 Billed G:72945 3/3/2008 Prepared motion for default judgment; Prepared notice of motion; Prepared certificate of service; Prepared exhibits; Prepared affidavit of attorney fees; Prepared draft order.	RJS Billable CBOND.N7551/19138	1.50 0.00 0.00 0.00	T@12	
353669 TIME 2/25/2008 Billed G:72945 3/3/2008 Prepared affidavit of Robert Lid in support of	RJS Billable CBOND.N7551/19138	1.00 0.00 0.00 0.00	T@12	

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Slip ID Dates and Time Posting Status Description	ATTORNEY Activity Case Reference	Units DNB Time Est. Time Variance	Rate Rate Info Bill Status	Slip Value
<u>prove up. Prepared letter to Robert Lid regarding same.</u>				
354743 3/17/2008 Billed FILING FEE 2/20/08	EXP G:73142 4/2/2008	CPW \$DC CBOND.N7551/19138	1	350.00 350.00
357082 4/30/2008 WIP Court Appearance	TIME	RJS Billable CBOND.N7551/19138	1.00 0.00 0.00 0.00	T@12
357087 4/30/2008 WIP Prepared motion for default judgment; Prepared notice of motion; Prepared certificate of service; Prepared exhibits; Prepared affidavit of attorney fees; Prepared draft order.	TIME	RJS Billable CBOND.N7551/19138	1.75 0.00 0.00 0.00	T@12
357088 4/30/2008 WIP Prepared affidavit of Robert Lid in support of prove up. Prepared letter to Robert Lid regarding same.	TIME	RJS Billable CBOND.N7551/19138	1.00 0.00 0.00 0.00	T@12
Grand Total		Billable Unbillable Total	9.75 0.00 9.75	

~~-2.75~~
 7.00 ~~28~~ / 165.00
~~\$115.00~~